

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.
	)	
	)	
MISCELLANEOUS JEWELRY	)	
AND FIREARMS,	)	
	)	
	)	
Defendant.	)	

VERIFIED COMPLAINT IN FORFEITURE

AND NOW comes the United States of America by and through its counsel, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Lee J. Karl, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. This is a civil action in rem for the forfeiture to the United States of miscellaneous jewelry and firearms (the Defendant Property), pursuant to 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 924(d)(1). The Defendant Property is listed on Exhibit "A", attached hereto and incorporated herein.
2. Jurisdiction is predicated upon 28 U.S.C. §1345 and §1355. Venue is proper under 28 U.S.C. §1395 and §1355.
3. On February 24, 2011, pursuant to a federal search warrant, the Drug Enforcement Administration (the "DEA") seized the Defendant Property from the residence of Dion Williams and Lance Williams while located within the Western District of Pennsylvania. As part of the

federal search, the DEA also seized as evidence 61.99 gg of marijuana from a second floor bedroom, 40.66 gg of marijuana from the kitchen table and four cell phones.

4. The Defendant Property has remained in the Western District of Pennsylvania in the custody of the United States Marshals Service.

5. Subsequent to its seizure, the DEA instituted administrative forfeiture proceedings against the Defendant Property. Dion Williams filed a claim to the miscellaneous jewelry, and Lance Williams filed a claim to the miscellaneous firearms as part of the administrative forfeiture proceedings. As a result, the United States has instituted this civil forfeiture action against the Defendant Property.

6. Dion Williams has been the subject of an ongoing criminal investigation (the Investigation) conducted by the DEA for violations of 21 U.S.C. §§ 841 and 846. The Investigation revealed that Dion Williams and others unlawfully sold and distributed crack cocaine in the Western District of Pennsylvania and generated thousands of dollars of illegal drug proceeds. The Investigation also revealed that the miscellaneous jewelry was purchased with proceeds generated from the illegal distribution of crack cocaine. The Investigation further revealed that the miscellaneous firearms were accessible to Dion Williams, a convicted felon, in violation of 18 U.S.C. § 922(g)(1).

7. The miscellaneous jewelry is traceable to proceeds of illegal narcotics transactions in violation of Title 21 of the United States Code, and, therefore, is forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6). The miscellaneous firearms seized from the residence of Dion Williams and Lance Williams were linked to Dion Williams, a convicted felon, in violation of Title 18 of the United States Code, and therefore, are forfeitable pursuant to 18 U.S.C. § 924(d).

8. This civil action is related to the criminal action against Dion Williams at Criminal No. 11-156. On July 12, 2011, a grand jury sitting in the Western District of Pennsylvania returned a three-count Indictment against Dion Williams for trafficking crack cocaine in violation of 21 U.S. C. §§ 841 and 846. The Indictment is attached hereto as Exhibit "B" and incorporated herein.

9. By reason of the foregoing, and under the provisions of 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 924(d)(1), the Defendant Property became and is forfeitable to the United States.

WHEREFORE, the United States of America respectfully requests that process of warrant in rem issue for the arrest of the Defendant Property; that judgment of forfeiture be entered in favor of the United States for the Defendant Property; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this Action.

Respectfully submitted,

DAVID J. HICKTON  
United States Attorney

By: s/ Lee J. Karl  
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VERIFICATION

I am a Special Agent of the Drug Enforcement Administration, Department of Justice, and the case agent assigned the responsibility for this case.

I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 20 day of July, 2011.

  
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MELISSA COBB, SPECIAL AGENT  
Drug Enforcement Administration